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Siskiyou; Jeremiah LaRue and Jesus  
Fernandez, in their official capacities  
as members of the Siskiyou County  
Sheriff's Department and in their individual  
capacities; Brandon Criss, Ed Valenzuela,  
Michael N. Kobseff, Nancy Ogren, and  
Ray A. Haupt, in their official capacities  
as members of the Siskiyou County Board  
of Supervisors and in their individual  
capacities; Edward Kiernan, in his official  
capacity as County Counsel for Siskiyou  
County and in his individual capacity;  
and DOES 1-100.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

Dilevon Lo, Jerry Vang, Nathan Thao, Mao  
Thao, Pao Lee, Antonio Lee, Koua Lee, Nhia  
Thai Vang, Zeng Lee, Der Lee and Khue Cha

Plaintiffs,

vs.

County of Siskiyou; Jeremiah LaRue and  
Jesus Fernandez, in their official capacities as  
members of the Siskiyou County Sheriff's  
Department and in their individual capacities;  
and Brandon Criss, Ed Valenzuela, Michael  
N. Kobseff, Nancy Ogren, and Ray A. Haupt,  
in their official capacities as members of the  
Siskiyou County Board of Supervisors and in  
their individual capacities; Edward Kiernan,  
in his official capacity as County Counsel for  
Siskiyou County and in his individual  
capacity; and DOES 1-100,

Defendants.

Case No.: 2:21-cv-00999-KJM-DMC

**DEFENDANTS' OBJECTIONS TO THE  
AFFIDAVIT OF NHIA THAI VANG  
DATED JULY 6, 2021 (CM/ECF NO. 26)**

Complaint Filed: June 4, 2021

First Amended Complaint Filed: July 15, 2021

Date: August 6, 2021

Time: 10:00 AM

**[FEES EXEMPT PURSUANT TO  
GOVERNMENT CODE SECTION 6103]**

Defendants hereby submit their objections to the supplemental affidavit filed by Nhia Thai Vang in support of Plaintiffs' original motion for TRO and preliminary injunction and the current motion for preliminary injunction.

| Material Objected To:  | Grounds for Objection:                          | Ruling on Objection: |
|--|---|----------------------|
| Supplemental Affidavit of Nhia Thai Vang, July 6, 2021, ¶4   | Hearsay. (FRE 801)                              | Sustained: _____     |
| “In the June 11 affidavit, I explained that my wife and I were told we could not put in a well when we purchased our property in 2015 due to the high salt content. I also explained that my wife and I depend on our daughter and son-in-law to bring us water in 55-gallon drums.” | Inadmissible opinion. (FRE 701)                 | Overruled: _____     |
| ¶5   | Prejudicial, confusing and misleading (FRE 403) |                      |
| ¶5   | Contradictory to original declaration ¶8        |                      |
| “My daughter and son-in-law both work full-time jobs so my wife and I are only able to get water from them when they have availability.”   | Irrelevant.                                     | Sustained: _____     |
| ¶6   | Prejudicial, confusing and misleading (FRE 403) | Overruled: _____     |
| “My wife and I have chickens and ducks that we rely on for food. We also have two dogs. Before the water truck ban, we had over 100 chickens and ducks. Many of them have died due to lack of water. Now we only have around six or seven chickens and thirty ducks.”                | Irrelevant.                                     | Sustained: _____     |
| ¶7   | Prejudicial, confusing and misleading (FRE 403) | Overruled: _____     |
| ¶7   | Lacks foundation.                               |                      |
| “My wife and I have had to ask friends to borrow water when possible.”   | Inadmissible opinion. (FRE 701)                 |                      |
| ¶8   | Irrelevant.                                     | Sustained: _____     |
| “Attached as Exhibit A are true and correct photos of my wife, Bao Lee, and me with our chickens on our property in Siskiyou County. The photos were taken on June 24, 2021.”  | Prejudicial, confusing and misleading (FRE 403) | Overruled: _____     |